

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
DIRECT REPORT CORPORATION d/b/a)	
SHAREHOLDER.COM,)	
)	
Plaintiff,)	
v.)	Civil Action No. 04-10535-PBS
)	
CCBN.COM, INC., THE THOMSON)	
CORPORATION, ROBERT I. ADLER,)	
JOHN DOES 1 THROUGH 5,)	
AND JANE DOES 1 THROUGH 5,)	
)	
Defendants.)	
_____)	

**JOINT MOTION TO EXTEND TIME TO
FILE OBJECTIONS TO THE MAGISTRATE JUDGE'S RECENT ORDERS
REGARDING VARIOUS DISCOVERY ISSUES**

Plaintiff, Direct Report Corporation d/b/a Shareholder.com ("Shareholder"), defendants CCBN.com, Inc. and Thomson Corporation (collectively "CCBN"), and defendant Robert I. Adler ("Adler") hereby jointly move for an extension of time in which the parties may file objections to Magistrate Judge Alexander's recent orders on various discovery issues¹ to January 27, 2006. The parties are actively engaged in serious settlement discussions. A small amount of additional time will (a) aid these efforts and (b) potentially save each party the unnecessary time and expense associated with filing and responding to the various objections currently contemplated.

¹ See *Order* dated January 4, 2006 regarding Adler's Motion For A Protective Order, Or, Alternatively, To Quash Plaintiff's Subpoenas To Inspect His Personal Computers; *Order* dated December 27, 2005 regarding (a) Shareholder's Motion for Leave to Share Information Designated as "Confidential" with The Attorney General's Office; (b) Defendant Adler's Motion for Additional Time to Depose Plaintiff's Officers and Other Key Witnesses; and (c) Shareholder's Motion to Compel Production of Documents; *Order* dated December 27, 2005 regarding Shareholder's Motion to Compel Defendants CCBN.com and The Thomson Corporation to Conduct Searches of CCBN.com's Electronic Back-up Tapes.

Respectfully submitted,

DIRECT REPORT CORPORATION
d/b/a. SHAREHOLDER.COM

By its attorneys,

/s/ Robert S. Frank, Jr.
Robert S. Frank, Jr. (BBO# 177240)
Carlos Perez-Albuerne (BBO# 640446)
CHOATE, HALL & STEWART
Two International Place
Boston, MA 02110
(617) 248-5000
rfrank@choate.com

CCBN.COM, INC. AND THE THOMSON
CORPORATION

By their attorneys,

/s/ Anthony S. Fiotto
Anthony S Fiotto (BBO # 558089)
Jennifer Chunias (BBO # 644980)
Goodwin Procter LLP
Exchange Place
Boston, MA 02109
(617) 570-1000

ROBERT I. ADLER

By his attorneys,

/s/ Michael S. D'Orsi
Peter E. Gelhaar (BBO #188310)
Michael S. D'Orsi (BBO # 566960)
Paula M. McManus (BBO # 648029)
Donnelly, Conroy & Gelhaar, LLP
One Beacon Street, 33rd Floor
Boston, MA 02108
Phone (617) 720-2880

Dated: January 20, 2006